

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIA WELLS,

Plaintiff,

-against-

LAW OFFICES OF ROSE & ROSE, PLLC,
ROSE & ROSE,

Defendants.
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WHEREAS, on July 6, 2023, Plaintiff filed an Amended Complaint wherein she alleged, *inter alia*, that she “had difficulty sleeping, had headaches that lasted for days, as well as diarrhea” and “lost almost thirty pounds over the course of the litigation” with Defendants in New York City Civil Court (the “Civil Court Action”) and sought actual damages “including emotional distress;”

WHEREAS, on August 18, 2023, Defendants served Plaintiff with their Second Set of Interrogatories and Second Requests for Production (collectively, the “Discovery Requests”) seeking, *inter alia*, documents and information relating to Plaintiff’s physical and mental condition during the Civil Court Action;

WHEREAS, on August 25, 2023, Plaintiff objected to the Discovery Requests seeking medical records and HIPAA authorizations relating to Plaintiff’s physical and mental condition during the Civil Court Action

WHEREAS, counsel for Plaintiff and Defendants have met and conferred regarding the Discovery Requests and the allegations in the Amended Complaint and reached a resolution;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that

1. Plaintiff withdraws the allegation in the second sentence of paragraph 93 of the Second Amended Complaint so that paragraph 93 now reads as follows: “Throughout the

SO ORDERED



Arun Subramanian, USDJ
September 15, 2023

Case No. 1:23-cv-1065 (AS)

**STIPULATION RESOLVING
DISCOVERY DISPUTE**

Dated: September 15, 2023